

1 Rena Andoh (admitted *pro hac vice*)
2 randoh@sheppardmullin.com.com
3 **SHEPPARD, MULLIN, RICHTER**
4 & HAMPTON LLP
5 30 Rockefeller Plaza
6 New York, NY 10112
7 Telephone: (212) 653-8700

8 Lai L. Yip (SBN 258029)
9 lyip@sheppardmullin.com
10 Four Embarcadero Center, 17th Floor
11 San Francisco, CA 94111
12 Telephone: (415) 434-9100

13 Travis J. Anderson (SBN 265540)
14 tanderson@sheppardmullin.com
15 12275 El Camino Real, Suite 100
16 San Diego, CA 92130
17 Telephone: (858) 720-8900

18 Kazim A. Naqvi (SBN 300438)
19 knaqvi@sheppardmullin.com
20 1901 Avenue of the Stars, Suite 1600
21 Los Angeles, CA 90067
22 Telephone: (310) 228-3700

23 Attorneys for Plaintiff and
24 Counterdefendant MOOG INC.

25 Rachel L. Fiset (SBN 240828)
26 rachel.Fiset@zfzlaw.com
27 Scott D. Tenley (SBN 298911)
28 scott.Tenley@zfzlaw.com
ZWEIBACK FISET &
ZALDUENDO LLP
315 W. 9th Street, Suite 1200
Los Angeles, California 90015
Telephone: (213) 266-5170

31 Attorneys for Defendant ROBERT
32 ALIN PILKINGTON

33 Douglas E. Lumish (SBN 183863)
34 doug.lumish@lw.com
35 Gabriel S. Gross (SBN 254672)
36 gabe.gross@lw.com
37 Arman Zahoory (SBN 306421)
38 arman.zahoory@lw.com
39 Rachel S. Horn (SBN 335737)
40 rachel.horn@lw.com

41 **LATHAM & WATKINS LLP**
42 140 Scott Drive
43 Menlo Park, CA 94025
44 Telephone: (650) 328-4600
45 Facsimile: (650) 463-2600

46 Attorneys for Defendant and
47 Counterclaimant SKYRYSE, INC.

48 Grant B. Gelberg (SBN 229454)
49 grant.Gelberg@halpernmay.com
50 Kevin H. Scott (SBN 274605)
51 kevin.Scott@halpernmay.com
52 Alyssa L. Titche (SBN 313296)
53 alyssa.Titche@halpernmay.com
54 Catherine Thompson (SBN 313391)
55 catherine.Thompson@halpernmay.com
HALPERN MAY YBARRA &
GELBERG LLP
56 550 South Hope Street, Suite 2330
57 Los Angeles, California 90071
58 Telephone: (213) 402-1900

59 Attorneys for Defendant MISOOK
60 KIM

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

MOOG INC.,

Plaintiff,

V.

SKYRYSE, INC., ROBERT
ALIN PILKINGTON, MISOOK
KIM, and DOES NOS. 1-50,

Defendants.

Case No. 2:22-cv-09094-GW-MAR

Hon. George H. Wu

**JOINT STIPULATION TO
CONTINUE HEARING ON
PLAINTIFF AND
COUNTERDEFENDANT MOOG
INC.'S MOTION FOR LEAVE TO
AMEND TO FILE AMENDED
COMPLAINT (DKT. 490)**

Complaint Filed: March 7, 2022

Counterclaims Filed: January 30, 2023

1 IT IS HEREBY STIPULATED by and between Plaintiff and Counter-
2 Defendant Moog Inc. (“Moog”), Defendant and Counterclaimant Skyryse, Inc.
3 (“Skyryse”), Defendant Misook Kim (“Kim”), and Defendant Robert Alin
4 Pilkington (“Pilkington”) (collectively, the “Parties”) through their respective
5 attorneys of record, as follows:

6 WHEREAS, on May 15, 2023, the Parties met and conferred regarding
7 Moog’s anticipated Motion for Leave to Amend to File Amended Complaint (the
8 “Motion for Leave”) as required under L.R. 7-3;

9 WHEREAS, on May 22, 2023, Moog filed its Motion for Leave (Dkt. 490),
10 with the hearing originally noticed for June 19, 2023;

11 WHEREAS, on May 23, 2023 the Court continued the hearing date on Moog’s
12 Motion for Leave from June 19, 2023 to June 22, 2023 (Dkt. 492);

13 WHEREAS, on June 1, 2023, Skyryse filed its Opposition to Moog’s Motion
14 for Leave (Dkt. 509);

15 WHEREAS, on June 2, 2023, Kim filed a joinder to Skyryse’s Opposition
16 (Dkt. 510);

17 WHEREAS, multiple members of Moog’s outside counsel team are traveling
18 over the next few days and Moog requires additional time to prepare its reply brief
19 in support of its Motion for Leave;

20 WHEREAS, the Parties have conferred and agree to continue the hearing date
21 on Moog’s Motion for Leave from June 22, 2023 to June 29, 2023;

22 WHEREAS, the Parties agree that, pursuant to Civil Local Rule 7-11, the
23 deadline to file Moog’s reply brief in support of the Motion for Leave would be
24 continued from June 8, 2023 to June 15, 2023;

25 NOW THEREFORE, subject to the Court’s approval, the Parties stipulate
26 and agree as follows:
27
28

1. The hearing date on Moog's Motion for Leave is continued from June 22, 2023 to June 29, 2023;
 2. The deadline for Moog to file its reply brief in support of its Motion for Leave is continued from June 8, 2023 to June 15, 2023.

IT IS SO STIPULATED.

Dated: June 6, 2023

SHEPPARD, MULLIN, RICHTER &
HAMPTON LLP

By: /s/ Kazim A. Naqvi
Kazim A. Naqvi
Counsel for Plaintiff and Counterdefendant
Moog Inc.

LATHAM & WATKINS LLP

By: /s/ Gabriel S. Gross
Gabriel S. Gross
Counsel for Defendant and Counterclaimant
Skyryse, Inc.

ZWEIBACK FISSET & ZALDUENDO LLP

By: /s/ Scott D. Tenley
Rachel L. Fiset
Counsel for Defendant Robert Alin
Pilkington

HALPERN MAY YBARRA & GELBERG
LLP

By: /s/ Grant B. Gelberg
Grant B. Gelberg
Counsel for Defendant Misook Kim

ATTESTATION

Pursuant to Civil Local Rule 5-4.3.4, I, Kazim A. Naqvi, attest that concurrence in the filing of this document has been obtained by all its signatories.

Dated: June 6, 2023

/s/ Kazim A. Naqvi